

ETHAN G. OSTROFF  
757.687.7541 telephone  
757.687.1541 facsimile  
ethan.ostroff@troutmansanders.com

# TROUTMAN SANDERS

TROUTMAN SANDERS LLP  
Attorneys at Law  
222 Central Park Avenue, Suite 2000  
Virginia Beach, VA 23462  
757.687.7500 telephone  
troutmansanders.com

January 5, 2012

**VIA E-MAIL AND US MAIL**

Ms. Kristi Cahoon Kelly  
Surovell Isaacs Petersen & Levy PLC  
4010 University Drive, 2nd Floor  
Fairfax, VA 22030

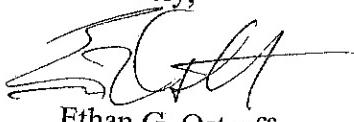
**Re: Victoria L. Frazier v. Experian Information Solutions, et al.**  
**Case No.: 3:11cv00497**

Dear Ms. Kelly:

Enclosed please find Defendant Litton Loan Servicing LP's Rule 26(a)(1) Initial Disclosures.

Please contact me with any questions.

Sincerely,



Ethan G. Ostroff

Enclosure

cc: Len Bennett, Esq.  
Matthew Erasquin, Esq.  
David Anthony, Esq.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

VICTORIA L. FRAZIER,

Plaintiff,

v.

Civil Action No. 3:11cv00497-JRS

EXPERIAN INFORMATION  
SOLUTIONS, INC., *et al.*

Defendants.

**DEFENDANT LITTON LOAN SERVICING LP'S  
RULE 26(a)(1) INITIAL DISCLOSURES**

Defendant Litton Loan Serving LP ("Litton"), by counsel, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, submit the following for its Initial Disclosures:

(A) Provide the name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

1. Victoria L. Frazier, a/k/a Victoria L. Meredith

c/o Kristi Cahoon Kelly  
Surovell Isaacs Petersen & Levy PLC  
4010 University Drive, 2nd Floor  
Fairfax, Virginia 22030  
703-277-9774  
Fax: 703-591-2149  
Email: kkelly@smillaw.com

Leonard A. Bennett  
Consumer Litigation Assoc PC  
12515 Warwick Blvd., Suite 1000  
Newport News, Virginia 23606  
E-mail: lenbennett@cox.net

Matthew J. Ebrausquin  
Consumer Litigation Assoc PC  
1800 Diagonal Road, Suite 600  
Alexandria, Virginia 22314  
E-mail: matt@clalegal.com

Plaintiff, Victoria L. Frazier, would have discoverable information regarding the allegations made in Plaintiff's Complaint.

2. Harry L. Frazier,  
Last known address:  
1330 Mountain View Road  
Stafford, Virginia 22554

Harry L. Frazier, may have discoverable information regarding the allegations made in Plaintiff's Complaint and/or Litton's Answer.

3. Corporate Representative(s) of Litton Loan Servicing LP  
c/o John C. Lynch and Ethan G. Ostroff  
Troutman Sanders LLP  
222 Central Park Avenue, Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7500

Litton's representative(s) would have discoverable information that Litton may rely upon to support its claims and/or defenses, including but not limited to discoverable information regarding the allegations made in Plaintiff's Complaint and the defenses set forth in Litton's Answer.

The following Litton employees and/or former employees may have discoverable information that Litton may rely upon to support its claims and/or defenses, including but not limited to the allegations made in Plaintiff's Complaint and information pertaining to the reporting and deletion of Plaintiff's tradeline:

4. Rex Lamb, Assistant Vice President, Loan Administration, for Litton during the time relevant to the allegations in the Plaintiff's Complaint.

c/o John C. Lynch and Ethan G. Ostroff  
Troutman Sanders LLP  
222 Central Park Avenue, Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7500

5. Alesha Luckett, an employee of Litton and part of the Customer Assistance Resolution Team ("CART") during the time relevant to the allegations in Plaintiff's Complaint

c/o John C. Lynch and Ethan G. Ostroff  
Troutman Sanders LLP  
222 Central Park Avenue, Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7500

6. Yvette Dillard-Frank, an employee of Litton and the CART Supervisor during the time relevant to the allegations in Plaintiff's Complaint

c/o John C. Lynch and Ethan G. Ostroff  
Troutman Sanders LLP  
222 Central Park Avenue, Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7500

The following entities, their employees and/or former employees may have discoverable information that Litton may rely upon to support its claims and/or defenses, including but not limited to the allegations made in Plaintiff's Complaint and information pertaining to the reporting and deletion of Plaintiff's tradeline:

9. Experian Information Solutions, Inc may have information regarding the allegations made in Plaintiff's Complaint and in Litton's Answer.

Experian Information Solutions, Inc.  
P.O. Box 2002  
Allen, TX 75013  
(888) 397-3742

10. Trans Union, LLC may have information regarding the allegations made in Plaintiff's Complaint and in Litton's Answer.

Trans Union, LLC  
1561 E. Orangethorpe Ave.  
Fullerton, CA 92831  
(714) 738-3800

11. The persons, entities or creditors who extended Plaintiff credit have knowledge regarding Plaintiff's applications, Plaintiff's credit history, the reasons Plaintiff was granted credit and any communications or correspondence between them and Plaintiff. The names, addresses and telephone numbers, if known, of the persons, entities or creditors who have extended credit to the Plaintiff are, at least in part, believed to in the possession, custody and/or control of Plaintiff, Trans Union, LLC, and/or Experian Information Solutions, Inc.
12. The persons and entities with whom Plaintiff has applied for credit have knowledge regarding Plaintiff's applications, Plaintiff's credit history, the reasons Plaintiff was granted or denied credit, and any communications or correspondence between them and Plaintiff. The names, addresses and telephone numbers, if known, of the persons, entities or creditors with whom Plaintiff has applied for credit, at least in part, believed to in the possession, custody and/or control of Plaintiff, Trans Union, LLC, and/or Experian Information Solutions, Inc.
13. The persons and entities who have reviewed Plaintiff's credit reports have knowledge regarding their communications and correspondence with Plaintiff and the reasons that they reviewed Plaintiff's credit reports and the contents of Plaintiff's credit reports. The names, addresses and telephone numbers, if known, of the persons, entities or creditors who have reviewed Plaintiff's credit reports are, at least in part, believed to in the possession, custody and/or control of Plaintiff, Trans Union, LLC, and/or Experian Information Solutions, Inc..

**(B) Provide a copy of, or description by category and location of, all documents, electronically stored information, data compilations, and tangible things in your possession, custody or control that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

The documents in Litton's possession, custody or control that it may use in support of its claims and/or defenses include the Deed of Trust signed by Plaintiff and Harry L.

Frazier, the Adjustable Rate and Balloon Payment Rider signed by Plaintiff and Harry L. Frazier, the 2010 Credit Reporting Resource Guide, Litton's Customer Assistance Response Team E-Oscar Disputes and Credit Corrections Policy/Procedure, Litton's Loan Administration Compliance Credit Reporting Policy/Procedure, Litton's Fair Lending for Loan Servicing course, correspondence from Litton to counsel for Plaintiff dated February 22, 2011 and March 29, 2011 (including to the extent applicable the exhibits thereto), correspondence from counsel for Plaintiff to Litton dated February 7, 2011 and March 25, 2011 (including to the extent applicable the exhibits thereto), the AUDF dated August 31, 2011, Adjustable Rate Note, Balloon Payment Rider to Note, Federal Truth in Lending Act Disclosure Statement, Notice of Right to Cancel, other loan origination documents, loan servicing notes, documents pertaining to the reporting of Plaintiff's trade line, and other loan documents.

In addition, Litton may use any document produced by Plaintiff, other defendants, or obtained from third-parties through discovery.

Litton reserves the right to supplement as applicable documents are made known to defense counsel. Litton reserves the right to object to the production of any documents described above on any basis permitted by the *Federal Rules of Civil Procedure*.

**(C) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or description by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Litton currently claims no damages in this case. Litton reserves the right to amend its pleadings and add a claim for damages as new facts may arise.

**(D) Attach for inspection and copying as required under Fed. R. Civ. P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments to satisfy the judgment.**

At this time, Litton has not identified any applicable insurance agreement.

Litton reserves the right to supplement, modify and/or amend these disclosures.

Dated: January 5, 2012

Respectfully submitted,

LITTON LOAN SERVICING LP

By:



Of Counsel

John C. Lynch (VSB No. 39267)

Ethan G. Ostroff (VSB No. 71610)

*Counsel for Defendant Litton Loan Servicing LP*

TROUTMAN SANDERS LLP

222 Central Park Avenue, Suite 2000

Virginia Beach, Virginia 23462

Telephone: (757) 687-7500

Facsimile: (757) 687-1597

E-mail: [john.lynch@troutmansanders.com](mailto:john.lynch@troutmansanders.com)

E-mail: [ethan.ostroff@troutmansanders.com](mailto:ethan.ostroff@troutmansanders.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**VICTORIA L. FRAZIER,**

**Plaintiff,**

v.

**Civil Action No. 3:11cv00497-JRS**

**EXPERIAN INFORMATION  
SOLUTIONS, INC., *et al.***

**Defendants.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of January, 2012, a true and correct copy of the foregoing Rule 26(a)(1) Initial Disclosures, were sent via electronic mail and first class mail, postage prepaid, to the following counsel of record:

**Counsel for Plaintiff**

Kristi Cahoon Kelly

Surovell Isaacs Petersen & Levy PLC

4010 University Drive, 2nd Floor

Fairfax, Virginia 22030

703-277-9774

Fax: 703-591-2149

Email: [kkelly@smillaw.com](mailto:kkelly@smillaw.com)

Leonard A. Bennett

Consumer Litigation Assoc PC

12515 Warwick Blvd., Suite 1000

Newport News, Virginia 23606

E-mail: [lenbennett@cox.net](mailto:lenbennett@cox.net)

Matthew J. Erausquin

Consumer Litigation Assoc PC

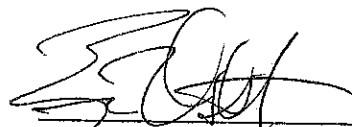
1800 Diagonal Road, Suite 600

Alexandria, Virginia 22314

E-mail: [matt@clalegal.com](mailto:matt@clalegal.com)

**Counsel for Defendant Experian Information Solutions, Inc.**

David N. Anthony  
Troutman Sanders LLP  
Troutman Sanders Bldg  
1001 Haxall Point  
P.O. Box 1122  
Richmond, Virginia 23218-1122  
E-mail: [david.anthony@troutmansanders.com](mailto:david.anthony@troutmansanders.com)



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Ethan G. Ostroff (VSB No. 71610)  
*Counsel for Defendant Litton Loan Servicing LP*  
TROUTMAN SANDERS LLP  
222 Central Park Avenue, Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7541  
Facsimile: (757) 687-1541  
E-mail: [ethan.ostroff@troutmansanders.com](mailto:ethan.ostroff@troutmansanders.com)

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